

August 02, 2021

Delivery via First Class Mail (USPS)

The Hon. Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Andre Wilburn, No. 19-CR-139(RJD)

Defendant's Motion to Reveal the Deal and Incorporated Memorandum
in Support (Letter-Motion)

Dear Judge Dearie:

Please construe this letter as a formal motion. The defendant, Andre Wilburn, moves this court to issue an order requiring the government to reveal any agreement entered between the United States Attorney's Office or any law enforcement agency and any prosecution witnesses, including co-accused Lamont Brown and Adam Micek, that could conceivably influence said witnesses testimony on the following grounds:

1. That the credibility of said witnesses, including Brown and Micek, will be an important issue in the principle case and the evidence of any understanding or agreement as to future prosecution or leniency of sentencing or culpability would be relevant to such witnesses credibility and if the trial jury would have been entitled to know it.
2. That a refusal to reveal any said agreements constitutes a violation of the "confrontation clause" of the Sixth Amendment of the

United States Constitution. See *Giglio v. United States*,
405 U.S. 150 (1972)

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Andre Wilburn", written in a cursive style.

Andre Wilburn